

Carol Stein

SEP 9 1993

Mr. John Middelkoop  
Chief, Bureau of Eastern Hazardous  
Waste Programs  
Division of Hazardous Substances Regulation  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-0001

Re: Grumman Aerospace Corporation - Bethpage  
Resource Conservation and Recovery Act  
EPA I.D. No.: NYD002047969

Dear Mr. Middelkoop:

We have reviewed the draft Phase 2 RCRA Facility Investigation (RFI) for the Grumman Aerospace Corporation facility, located in Bethpage, New York. The RFI appears to be acceptable, provided that the following is acknowledged by the Navy:

Recharge Basins

1- Section 4.7.3 (p. 4-45) of the report notes that off-site groundwater contamination at intermediate depths is probably due to recharge basin water. However, the section of the report on the recharge basins investigation does not address this connection. The Navy should select a remedy which thoroughly addresses contamination which may have migrated from the recharge basins.

2- Section 1.4.3 (p. 1-9) of the report states that "since the concentration of volatile organics in the surface water was lower than in the production wells, the system likely resulted in partial treatment of the groundwater by volatilization." The words "partial treatment" are not acceptable because transfer of contamination from one medium to another (in this case from water to air) without any monitoring or control of emissions, should not be considered a treatment method.



3- In a September 1, 1993 telephone conversation between Ms. Carol Stein of my staff and Mr. James Colter of the U.S. Navy, Mr. Colter said that in reference to the former drum marshalling area (site #1), it is not critical for the sources of contamination to be determined for this area as long as all the contamination in the area is remediated. Mr. Colter stated that the entire site #1 will be remediated regardless of whether the source of contamination can be determined. We agree with this approach provided that diligent effort will be taken by the Navy in determining that the area is thoroughly remediated. Please transmit these comments to the U.S. Navy along with any additional comments which you may have. Please also ensure that the comment letter is jointly signed by EPA and NYSDEC. If you should have any questions, Ms. Carol Stein, of my staff, can be contacted at (212) 264-5130.

Sincerely yours,

Andrew Bellina, P.E.  
Chief, Hazardous Waste Facilities Branch

cc: Dennis Lucia, NYSDEC  
Kelly Bologna, NYSDEC

bcc: J. Reidy, 2AWM-HWF  
C. Stein, 2AWM-HWF